

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

STRIKE 3 HOLDINGS, LLC,

*Plaintiff,*

v.

PAUL SCHORN,

*Defendant.*

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Civil Case No. 3:18-cv-00616-D

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**DEFENDANT’S UNOPPOSED MOTION TO EXTEND TIME TO ANSWER  
OR OTHERWISE RESPOND TO PLAINTIFF’S FIRST AMENDED COMPLAINT**

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**TO THE HONORABLE JUDGE OF SAID COURT:**

NOW COMES, PAUL SCHORN, Defendant and files this his Unopposed Motion to Extend Time to Answer or Otherwise Respond to Plaintiff’s First Amended Complaint, and respectfully shows unto the Court as follows, *to-wit*:

**I.**

1. On May 30, 2018, Strike 3 Holdings, LLC, (“**Plaintiff**”) filed its First Amended Complaint against Paul Schorn (“**Defendant**”).

2. On June 4, 2018, Defendant was served with process of this instant lawsuit, causing the deadline to answer or otherwise respond to Plaintiff’s First Amended Complaint to be June 25, 2018.

3. Plaintiff and Defendant are currently engaged in settlement negotiations.

4. Defendant, therefore, requests that the Court extend the deadline for Defendant to answer or otherwise respond to Plaintiff’s First Amended Complaint by thirty (30) days, thereby causing Defendant’s deadline to answer or otherwise respond to the lawsuit to be **July 25, 2018**.

4. Counsel for Plaintiff has stated that Plaintiff is unopposed to the relief sought in this Motion.

5. This request is not sought for purposes of delay, but so that justice may be done

**PRAYER**

**WHEREFORE, PREMISES CONSIDERED,** Defendant respectfully requests that the Court grant this Motion and extend Defendant's deadline to answer or otherwise respond to Plaintiff's First Amended Complaint to July 25, 2018.

Respectfully submitted,

/s/ Aaron P. Peacock

Aaron P. Peacock

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**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF CONFERENCE**

This certifies that I have contacted the attorney for Plaintiff, Mr. Lincoln Bandlow, to discuss the merits of this motion. Mr. Bandlow is UNOPPOSED.

/s/ Aaron P. Peacock

Of Gagnon, Peacock & Vereeke P.C.

**CERTIFICATE OF SERVICE**

The following document was served on Andy Nikolopoulos (and all parties receiving electronic service) per the local and federal rules of procedure via either forwarding same as first-class mail with the United States Postal Service or by causing same to be filed in this case via electronic transmission via portable document format (.pdf) to the EM/ECF Internet web portal for this Court in this Case on 19th day of June, 2018.

/s/ Aaron P. Peacock  
Of Gagnon, Peacock & Vereeke P.C.